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1	**Comment Code**	**Summary Main Comments**	**Pg. #**	**Category of Comment**
2	57-XX	Management measures do not provide sufficient protection of water bodies from temperature pollution. Temperature pollution is the most prevalent water quality problem in coastal lowland streams, is pronounced in agricultural areas, and is key to salmonid productivity. Therefore the incorporation of these management measures into agricultural plans likewise is not sufficient to address temperature. The omission of a specified and sufficient width, height, and density of riparian vegetation fails to ensure that these plans will control key factors in nonpoint source contributions to temperature.	30, 40	Ag - MM; Ag-buffers
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13	57-YY	Protection of riparian vegetation from livestock is assumed to occur by the use of measures that are flawed, such as providing salt and water away from riparian zones. The CNCP and ag rules erroneously assume that only slight improvements in grazing practices are required. **There are no criteria in the MM for what constitutes "improved" management, leaving the provision open to broad interpretation and adoption of grazing management approaches that do not effectively protect or restore riparian vegetation and stream shading.** & ##The MM do not require grazing cessation in riparian areas during the summer##	NWEA comment letter31, 41: **Rhodes Decl. pp. 6 & 7 ** ##Rhodes Decl. p. 8 ##	Ag - MM; Ag-buffers; grazing
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33 34 35 36 37 38 39 40 41	57-ZZ	The management measures in Oregon's agricultural plans are also deficient to provide protection of stream banks and bank stability. Stream banks are key to protecting water bodies from elevated sediment delivery that affects levels of turbidity and fine sediment in streams. Eroding stream banks also contribute to temperature increases, reduce large woody debris to streams which is critical to salmonid recovery, and contribute to nutrient and pesticide delivery from upslope agricultural activities,	31	Ag - MM; Ag - buffers; Ag - pesticide, Ag - Legacy

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50	57-AAA	The management measures fail to address the need to anticipate inundation of agricultural lands by	31	Ag - MM

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51		floodwaters in establishing practices.		
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55	57-BBB	The lack of a sedimentation standard that Oregon uses or has a methodology for using undermines some existing agricultural basin rules that are specifically linked to the standard. For example, the Umpqua Basin rules define "substantial amounts of sediment (i.e. in excess of water quality standards for sedimentation) moving from agricultural lands into waters of the state as a result of agricultural activities" as an "unacceptable condition." Because Oregon DEQ has not defined the meaning of "in excess of water quality standards," this key condition pertaining to the effect of nonpoint sources pollution in ODA's rules has no meaning.	78	Ag - MM; Ag-General; Sediment
56 57 58 59 60	57-Z	Oregon has relied on the TMDL program to-demonstrate to the federal agencies that it has a plan in place to control nonpoint source pollution in coastal watersheds. EPA cannot rely on these assertions given Oregon's own failure to use the TMDL program to bring nonpoint sources into compliance with load allocations established in the TMDLs.	32, 33, 34, 36	General -- fails to meet wqs/uses; Ag -- General; Ag Enforcement/ Efficacy; Legal

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62	57-DDD	DEQ is unwilling to use its own legal authorities to control agricultural nonpoint pollution.	32	Ag- Enforcement
63	57-EEE	DEQ's has proven their inability to control nutrient pollution.	32	Ag - Enforcement/ Efficacy Nutrients
64	57-FFF	DEQ fails to control livestock wastes.	32, 36, 41	Ag - Enforcement/ Efficacy CAFO
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68	57-GG	Oregon's management measures for pesticides are not adequate to meet water quality standards including full support of designated uses in Oregon and additional management measures are required.	32, 47-53	General -- fails to meet wqs/uses; Toxics/Pesticides ; Forestry -- pesticides; Ag -- Pesticides
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79	57-X	The federal agencies claim that ODA's agricultural plans are a "mechanism for addressing eroding streambanks because agricultural activities that cause eroding streambanks are subject to regulatory actions by ODA." However, the federal agencies state that "eroding stream banks in the coastal nonpoint management area are primarily due to legacy forestry and agricultural practices which resulted in the removal of vegetation from riparian areas, and damage to the natural stream morphology from practices such as canalization, installation of tide gates and splash damming." Having claimed that eroding stream banks are primarily due to legacy practices and having concluded that the plans are subject to regulatory actions, EPA and NOAA then state that "legacy conditions . . . are not addressed through existing regulatory tools." How then can they have concluded the agricultural	34-35	Ag -- legacy; Ag -- EP& M's, Ag - Enforcement, Legal
80 81 82 83 84	57-GGG	ODA reads its enforceable rules in a very narrow fashion so as to exclude conditions it considers "legacy conditions." The result of this narrow reading is that ODA's enforcement authority excludes most of Oregon's agricultural nonpoint source contributions, particularly its contribution to temperature in Oregon's streams from lack of shade and from excess sedimentation.	35	Ag - Legal Ag-Enforcement/ Voluntary/ efficacy

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86	57-AA	DEQ has issued NPDES permits in the Rogue River Basin on the assumption that nonpoint sources will contribute zero heat load, but made a completely contrary assumption when it allowed the City of Medford to plant trees on agricultural lands in lieu of directly reducing the thermal load in its discharge. This contrary assumption undermines any suggestion that Oregon relies on the load allocations established for nonpoint sources in its temperature TMDLs to protect riparian vegetation sufficient to meet water quality standards.	37	General -- fails to meet wqs/uses; Ag -- General
87	57-HHH	Oregon does not implement the required management measures and does not have a process by which it identifies practices to implement the management measures.	37	Ag - Efficacy implementation Ag - General
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91	57-BB	Approvable state programs are required to assess over time the success of the management measures in reducing pollution loads and improving water quality. Because it has not identified the	37	General -- need to consider other issues; Ag -- General; Ag monitoring efficacy

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92 93		practices that constitute Oregon's version of meeting management measures, it would be impossible for the state to ascertain whether the management measures are in place and whether they have been successful in reducing pollutant loads sufficiently to avoid the need for additional management measures.		
94	57-CC	Oregon water quality standards and designated uses require the implementation of additional management measures. Given that in almost all instances, an allocation to all nonpoint sources for temperature increases is zero, it is even more likely that agriculture is currently contributing to violations of temperature standards and therefore requires additional management measures.	39 & 41	Ag - Additional MM; General -- fails to meet wqs/uses; General -- need to consider other issues; Ag - General
95 96 97 98	57-BB	Approvable state programs are required to assess over time the success of the management measures in reducing pollution loads and improving water quality. Because it has not identified the practices that constitute Oregon's version of meeting management measures, it would be impossible for the state to ascertain whether the management measures are in place and whether they have been successful in reducing pollutant loads sufficiently to avoid the need for additional management measures.	37 - 45	General -- need to consider other issues; Ag -- General; Ag monitoring efficacy

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103	57-FF	Bear Creek cannot be held up as an example of how Oregon has a program to control agricultural nonpoint source pollution because it is primarily an example of how unique circumstances can pressure nonpoint sources into taking significant action. Absent those circumstances, the actions will not occur.	45-46	General - voluntary approaches; Ag -- General
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107	57-HH	Despite the lack of any additional ODA rules beyond the EPA pesticide labels, which have been demonstrated to be inadequate for protection of threatened coho, EPA and NOAA have not made any findings on the adequacy of Oregon's program to protect water quality and designated uses from pesticides applied to agricultural lands.	49	Toxics/Ag & Forestry Pesticides: Salmon -- need more protection
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117	57-DD	The last of the agricultural plans were put in place by ODA in October 2007. The plans and rules have been in place for such a long time,	40-45	General -- fails to meet wqs/uses; Ag -- General

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118		yet Oregon cannot point to their widespread success in addressing the conditions on agricultural lands that have caused and contributed to violations of water quality standards.		
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125	57-EE	ODA's most recent new efforts to address agricultural water quality are inadequate to meet CZARA management measures and additional management measures that are needed. None of the ODA basin rules incorporates additional	42-45	General -- fails to meet wqs/uses; General -- need to consider other issues; Ag - General
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127		management measures as needed to meet the zero load allocations established in the existing temperature TMDLs for Oregon coastal watersheds.		
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50	Declaration of Jonathan J. Rhodes in Support of EPAs and NOAA's Proposal to Disapprove the State of Oregon's CNCP, March 14, 2014;	NWEA comment letter p. 30.

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57	Memorandum from Gene Foster, DEQ, to MidCoast TMDL LSAC, Re: MidCoast IR-TMDL Approach Update (March 19, 2013) (absence of any reference to identification of practices and their enforceability)	p. 33
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81	Letter from Nina Bell, NWEA, to Lisa Hanson, ODA, Re: Interpretation of Oregon Department of Agriculture Basin Rules (June13, 2012)	p.35
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84	Email from Katy Coba, ODA, to Nina Bell, NWEA Re: reply to your letter (June 27, 2012)	p.35

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95	Oregon Department of Agriculture, Water Quality Management Program, Streamside Vegetation Assessment Tool - User's Guide, Version 1 (Nov. 4, 2013) (hereinafter "Use's Guide") at 3	p. 42
96	Letter from Nina Bell, NWEA to Cheryl Hummon, ODS Re: User's Guide for the Streamside Vegetation Assessment Tool; Review Draft October 29, 2013 (Oct. 31, 2013).	p. 42
97	NMFS, Letter from Will Stelle, NMFS, to Roylene Rides-at-the-Door, USDA NRCS, and Dennis McLerran, EPA, (Jan. 30, 2014) with attachments: (1) Memorandum from Usha Varanasi, NMFS to Robert Lohn, NMFS, Re: Review "Efficacy and Economics of Riparian Buffers on Agricultural Lands" (March 17, 2003), and (2) NMFS, Interim Riparian Buffer Recommendations for Streams in Puget Sound Agricultural Landscapes November 2012 (Originally proposed as federal Option 3 for the Agriculture Fish and Water (AFW) Process, March 2002).	p. 42
98	Oregon DEQ, DEQ Preliminary Comments on the Proposed Streamside Vegetation Assessment Tool (July 9, 2013) at 3-4 &1	p. 43

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99	ODA, ODA Agricultural Water Quality Management Program, Proposed Tools For Measuring Progress in Small Watersheds: Streamside Vegetation Assessment Compliance Evaluation Summary of Issues Under Discussion Between ODA and DEQ, DRAFT - July 22, 2013 at 2	p. 44
100	ODA Powerpoint presentation: "Firewalls . . . Vegetation Assessment ≠ Compliance Evaluation." See ODA, ODA Ag Water Quality Program, Streamside Vegetation Assessment Tool, OACD Conference, November 7, 2013 at Slide 12	p. 44, 45
101	ODA, ODA Agricultural Water Quality Management Program, Proposed Tools For Measuring Progress in Small Watersheds DRAFT Overview – September 4, 2013	p. 45
102	ODA, ODA Ag Water Quality Program, Updates Agricultural Water Quality Program Advisory Committee July 25, 2013, Slides 7, 17 & 38.	p. 45
103	Oregon DEQ, Making Progress in the Bear Creek Watershed: Stakeholders' watershed approach reduces phosphorus levels	p.45
104	Oregon DEQ, Bear Creek Watershed 1992 TMDLs	p.45
105	Bear Creek Watershed Council, Rogue Valley Council of Governments, Bear Creek Watershed Assessment, Phase II - Bear Creek Tributary Assessment, Summary (Dec. 2001)	p. 46
106	Medford Irrigation District, Klamath Basin Adjudication Information Sheet (June 4, 2013)	p. 46
107	See NWEA Letter to Michael Bussell, EPA, and John King, NOAA, Re: Oregon Coastal Nonpoint Pollution Control Program; EPA and NOAA's Interim Approval of Agricultural Management Measures for Oregon (May 2, 2012) at 29-30.	p. 47
108	NWEA Letter to Michael Bussell, EPA, and John King, NOAA, Re: Oregon Coastal Nonpoint Pollution Control Program; EPA and NOAA's Interim Findings on Pesticides (Aug. 20, 2012); NWEA, Petition to Initiate Rulemaking and Take Other Actions to Protect Existing and Designated Uses of Fish and Wildlife From Point and Nonpoint Sources of Pesticides (Aug. 9, 2012)	p. 47 - 52

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109	NMFS, National Marine Fisheries Service Endangered Species Act Section 7 Consultation Biological Opinion Environmental Protection Agency Registration of Pesticides Containing Chlorpyrifos, Diazinon, and Malathion 269 (November 18, 2008) available at http://www.nmfs.noaa.gov/pr/pdfs/pesticide_biop.pdf (last accessed July 25, 2012) (hereinafter "Chlorpyrifos BiOp");	p.47
110	NMFS, National Marine Fisheries Service Endangered Species Act Section 7 Consultation Biological Opinion Environmental Protection Agency Registration of Pesticides Containing Carbaryl, Carbofuran, and Methomyl 488 (April 20, 2009) available at http://www.nmfs.noaa.gov/pr/pdfs/carbamate.pdf (last accessed July 25, 2012);	p.47 &48
111	NMFS, National Marine Fisheries Service Endangered Species Act Section 7 Consultation Biological Opinion Environmental Protection Agency Registration of Pesticides Containing Azinphos methyl, Bensulide, Dimethoate, Disulfoton, Ethoprop, Fenamiphos, Naled, Methamidophos, Methidathion, Methyl parathion, Phorate and Phosmet 772-775 (August 31, 2010) available at http://www.nmfs.noaa.gov/pr/pdfs/final_ batch_3_opinion.pdf (last accessed July 25, 2012);	p.48
112	NMFS, National Marine Fisheries Service Endangered Species Act Section 7 Consultation Biological Opinion Environmental Protection Agency Registration of Pesticides 2,4-D, Triclopyr BEE, Diuron, Linuron, Captan, and Chlorothalonil 773-774 (June 30, 2011) available at http://www.nmfs.noaa.gov/pr/pdfs/consultations/pesticide_opinion4.pdf (last accessed July 25, 2012).	p. 48
113	Oregon DEQ, Pesticide Use in Vicinity of Drinking Water Sources; Summary of regulations and recommendations (undated).	p. 48
114	Oregon's 2010 Integrated Report, Water Quality Assessment Database;	p. 52
115	OSU, Pesticide Best Management Practices in the Hood River Watershed (undated) (showing high levels of azinphos- methyl).	p. 52
116	State of Oregon, Pesticide Management Plan for Water Quality Protection (May 2011)	p. 52 - 53
117	Oregon Department of Agriculture, Water Quality Management Program, Streamside Vegetation Assessment Tool - User's Guide, Version 1 (Nov. 4, 2013) (hereinafter "Use's Guide") at 3	p. 42

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118	Letter from Nina Bell, NWEA to Cheryl Hummon, ODS Re: User's Guide for the Streamside Vegetation Assessment Tool; Review Draft October 29, 2013 (Oct. 31, 2013).	p. 42
119	NMFS, Letter from Will Stelle, NMFS, to Roylene Rides-at-the-Door, USDA NRCS, and Dennis McLerran, EPA, (Jan. 30, 2014) with attachments: (1) Memorandum from Usha Varanasi, NMFS to Robert Lohn, NMFS, Re: Review "Efficacy and Economics of Riparian Buffers on Agricultural Lands" (March 17, 2003), and (2) NMFS, Interim Riparian Buffer Recommendations for Streams in Puget Sound Agricultural Landscapes November 2012 (Originally proposed as federal Option 3 for the Agriculture Fish and Water (AFW) Process, March 2002).	p. 42
120	Oregon DEQ, DEQ Preliminary Comments on the Proposed Streamside Vegetation Assessment Tool (July 9, 2013) at 3-4 &1	p. 43
121	ODA, ODA Agricultural Water Quality Management Program, Proposed Tools For Measuring Progress in Small Watersheds: Streamside Vegetation Assessment Compliance Evaluation Summary of Issues Under Discussion Between ODA and DEQ, DRAFT - July 22, 2013 at 2	p. 44
122	ODA Powerpoint presentation: "Firewalls . . . Vegetation Assessment ≠ Compliance Evaluation." See ODA, ODA Ag Water Quality Program, Streamside Vegetation Assessment Tool, OACD Conference, November 7, 2013 at Slide 12	p. 44, 45
123	ODA, ODA Agricultural Water Quality Management Program, Proposed Tools For Measuring Progress in Small Watersheds DRAFT Overview – September 4, 2013	p. 45
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128	Oregon DEQ, DEQ Preliminary Comments on the Proposed Streamside Vegetation Assessment Tool (July 9, 2013) at 3-4 &1	p. 43
129	ODA, ODA Agricultural Water Quality Management Program, Proposed Tools For Measuring Progress in Small Watersheds: Streamside Vegetation Assessment Compliance Evaluation Summary of Issues Under Discussion Between ODA and DEQ, DRAFT - July 22, 2013 at 2	p. 44
130	ODA Powerpoint presentation: "Firewalls . . . Vegetation Assessment ≠ Compliance Evaluation." See ODA, ODA Ag Water Quality Program, Streamside Vegetation Assessment Tool, OACD Conference, November 7, 2013 at Slide 12	p. 44, 45
131	ODA, ODA Agricultural Water Quality Management Program, Proposed Tools For Measuring Progress in Small Watersheds DRAFT Overview – September 4, 2013	p. 45
132	ODA, ODA Ag Water Quality Program, Updates Agricultural Water Quality Program Advisory Committee July 25, 2013, Slides 7, 17 & 38.	p. 45

	D
1	**Comment Code**
2	57-X
3	~~57-Y~~
4	57-Z
5	57-AA
6	57-BB

	D
7	57-CC
8	57-DD
9	57-EE
10	57-FF
11	57-GG
12	57-HH
13	57-AAA
14	57-XX

	D
15	57-YY
16	57-ZZ
17	57-BBB
18	57-CCC
19	57-DDD
20	57-EEE
21	57-FFF
22	57-GGG
23	57-HHH

	E
1	**Summary Main Comments**
2	~~EPA and NOAA state that legacy effects of agriculture (denuded riparian areas, damage to natural stream morphology, eroding streambanks, etc...) are not addressed though existing regulatory tools, and have concluded that agriculture plans are a regulatory mechanism to address past actions that are the primary cause of eroding streambanks.~~ The federal agencies claim that ODA's agricultural plans are a "mechanism for addressing eroding streambanks because agricultural activities that cause eroding streambanks are subject to regulatory actions by ODA." However, the federal agencies state that "eroding stream banks in the coastal nonpoint management area are primarily due to legacy forestry and agricultural practices which resulted in the removal of vegetation from riparian areas, and damage to the natural stream morphology from practices such as canalization, installation of tide gates and splash damming." Having claimed that eroding stream banks are primarily due to legacy practices and having concluded that the plans are subject to regulatory actions, EPA and NOAA then state that "legacy conditions . . . are not addressed through existing regulatory tools." How then can they have concluded the agricultural plans are a regulatory mechanism to address wholly past actions that are the primary cause of eroding streambanks?
3	~~ODA's enforcement authority excludes most of Oregon's agricultural nonpoint source contributions, particularly its contribution to temperature in Oregon's streams from lack of shade and from excess sedimentation.~~
4	Oregon has ~~repeatedly~~ relied on the TMDL program to ~~purportedly~~ demonstrate to the federal agencies that it has a plan in place to control nonpoint source pollution in coastal watersheds. EPA cannot rely on these assertions given Oregon's own failure to use the TMDL program to bring nonpoint sources into compliance with load allocations established in the TMDLs.
5	DEQ has issued NPDES permits in the Rogue River Basin on the assumption that nonpoint sources will contribute zero heat load, but made a completely contrary assumption when it allowed the City of Medford to plant trees on agricultural lands in lieu of directly reducing the thermal load in its discharge. This contrary assumption undermines any suggestion that Oregon relies on the load allocations established for nonpoint sources in its temperature TMDLs to protect riparian vegetation sufficient to meet water quality standards.
6	Approvable state programs are required to assess over time the success of the management measures in reducing pollution loads and improving water quality. Because it has not identified the practices that constitute Oregon's version of meeting management measures, it would be impossible for the state to ascertain whether the management measures are in place and whether they have been successful in reducing pollutant loads sufficiently to avoid the need for additional management measures.

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7	Oregon water quality standards and designated uses require the implementation of additional management measures. Given that in almost all instances, an allocation to all nonpoint sources for temperature increases is zero, it is even more likely that agriculture is currently contributing to violations of temperature standards and therefore requires additional management measures.
8	~~EPA and NOAA found that t~~The last of the agricultural plans were~~as~~ put in place by ODA in October 2007. ~~The fact that~~T~~t~~he plans and rules have been in place for ~~such~~ a long time, ~~should suggest that~~ yet Oregon cannot point to their widespread success in addressing the conditions on agricultural lands that have caused and contributed to violations of water quality standards. ~~In fact, they cannot.~~
9	ODA's most recent new efforts to address agricultural water quality are inadequate to meet CZARA management measures and additional management measures that are needed. None of the ODA basin rules incorporates additional management measures as needed to meet the zero load allocations established in the existing temperature TMDLs for Oregon coastal watersheds.
10	Bear Creek cannot be held up as an example of how Oregon has a program to control agricultural nonpoint source pollution because it is primarily an example of how unique circumstances can pressure nonpoint sources into taking significant action. Absent those circumstances, the actions will not occur.
11	Oregon's management measures for pesticides are not adequate to meet water quality standards including full support of designated uses in Oregon and additional management measures are required.
12	Despite the lack of any additional ODA rules beyond the EPA pesticide labels, which have been demonstrated to be inadequate for protection of threatened coho, EPA and NOAA have not made any findings on the adequacy of Oregon's program to protect water quality and designated uses from pesticides applied to agricultural lands.
13	The management measures fail to address the need to anticipate inundation of agricultural lands by floodwaters in establishing practices.
14	Management measures do not provide sufficient protection of water bodies from temperature pollution. Temperature pollution is the most prevalent water quality problem in coastal lowland streams, is pronounced in agricultural areas, and is key to salmonid productivity. Therefore the incorporation of these management measures into agricultural plans likewise is not sufficient to address temperature. The omission of a specified and sufficient width, height, and density of riparian vegetation fails to ensure that these plans will control key factors in nonpoint source contributions to temperature.

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15	Protection of riparian vegetation from livestock is assumed to occur by the use of measures that are flawed, such as providing salt and water away from riparian zones. The CNCP and ag rules erroneously assume that only slight improvements in grazing practices are required. **There are no criteria in the MM for what constitutes "improved" management, leaving the provision open to broad interpretation and adoption of grazing management approaches that do not effectively protect or restore riparian vegetation and stream shading.** & ##The MM do not require grazing cessation in riparian areas during the summer##
16	The management measures in Oregon's agricultural plans are also deficient to provide protection of stream banks and bank stability. Stream banks are key to protecting water bodies from elevated sediment delivery that affects levels of turbidity and fine sediment in streams. Eroding stream banks also contribute to temperature increases, reduce large woody debris to streams which is critical to salmonid recovery, and contribute to nutrient and pesticide delivery from upslope agricultural activities,
17	The lack of a sedimentation standard that Oregon uses or has a methodology for using undermines some existing agricultural basin rules that are specifically linked to the standard. For example, the Umpqua Basin rules define "substantial amounts of sediment (i.e. in excess of water quality standards for sedimentation) moving from agricultural lands into waters of the state as a result of agricultural activities" as an "unacceptable condition." Because Oregon DEQ has not defined the meaning of "in excess of water quality standards," this key condition pertaining to the effect of nonpoint sources pollution in ODA's rules has no meaning.
18	A legal error was committed by the federal agencies when they concluded that the inclusion of the CZARA management measures as appendices to the purely voluntary agricultural plans rendered the management measures enforceable.
19	DEQ is unwilling to use its own legal authorities to control agricultural nonpoint pollution.
20	DEQ's has proven their inability to control nutrient pollution
21	DEQ fails to control livestock wastes.
22	ODA reads its enforceable rules in a very narrow fashion so as to exclude conditions it considers "legacy conditions." The result of this narrow reading is that ODA's enforcement authority excludes most of Oregon's agricultural nonpoint source contributions, particularly its contribution to temperature in Oregon's streams from lack of shade and from excess sedimentation.
23	Oregon does not implement the required management measures and does not have a process by which it identifies practices to implement the management measures.

	F	H	I
1	**Pg. #**	**Category of Comment**	**HR Comments**
2	34	Ag -- legacy; Ag -- EP& M's, Ag - Enforcement, Legal	
3	~~35~~	~~Ag - General; Ag -- EP&M's~~	This is covered in more detail in comments 57-XX & 57- AAA & 57-X
4	32, 33, 36	General -- fails to meet wqs/uses; Ag - - General; Ag Enforcement/ Efficacy; Legal	
5	37	General -- fails to meet wqs/uses; Ag - - General	
6	37; 42- 45	General -- need to consider other issues; Ag -- General; Ag monitoring efficacy	

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7	39 & 41	General -- fails to meet wqs/uses; General -- need to consider other issues; Ag - General	
8	40-45	General -- fails to meet wqs/uses; Ag - - General	
9	41	General -- fails to meet wqs/uses; General -- need to consider other issues; Ag - General	
10	45-46	General - voluntary approaches; Ag -- General	
11	32, 47	General -- fails to meet wqs/uses; Toxics/Pesticides; Forestry -- pesticides; Ag -- Pesticides	
12	49	Toxics/Ag & Forestry Pesticides: Salmon -- need more protection	
13	31	Ag - MM	Added to database by HR
14	30, 40	Ag - MM; Ag-buffers	Added to database by HR

	F	H	I
15	31, **Rhodes Decl. pp. 6 & 7 ** ##Rhodes Decl. p. 8 ##	Ag - MM; Ag-buffers; grazing	Added to database by HR
16	31	Ag - MM; Ag - buffers; Ag - pesticide Ag - Legacy	Added to database by HR
17	78	Ag - MM; Ag-General; Sediment	Added to database by HR
18	32	Ag - Legal Ag-Enforcement/ Voluntary/ efficacy	Added to database by HR
19	32	Ag- Enforcement	Added to database by HR
20	32	Ag - Enforcement/ Efficacy Nutrients	Added to database by HR
21	32	Ag - Enforcement/ Efficacy CAFO	Added to database by HR
22	35	Ag - Legal Ag-Enforcement/ Voluntary/ efficacy	Added to database by HR
23	37	Ag - Efficacy implementation Ag - General	Added to database by HR